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August 7, 2025

## VIA ECF

Honorable Lorna G. Schofield  
Thurgood Marshall  
United States Courthouse  
Southern District of New York  
40 Foley Square  
New York, New York 10007

***Re: Mazzaccone v. The Bolivarian Republic of Venezuela***  
**Civil Case No. 24-cv-09114-LGS**

Your Honor:

We represent Plaintiff in the above-captioned matter. We write pursuant to Your Honor's July 30, 2025 Order directing Plaintiff to advise whether he intends to seek leave to file an amended complaint in this action against the defendant, The Bolivarian Republic of Venezuela ("the Republic") (D.E. 24.)

As referenced in the parties' joint letter dated July 29, 2025 (D.E. 22.), which the Court endorsed, Plaintiff intends to seek leave to amend the complaint on consent pursuant to Fed. R. Civ. P. 15(a)(2) in an effort to avoid unnecessary motion practice.

We thank the Court for its attention to this matter and would be happy to answer any questions regarding the foregoing.

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Respectfully submitted,

By:   
Anthony J. Costantini

AJC